

EXHIBIT “A”

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PRIVILEGED & CONFIDENTIAL

July 13, 2023

Official Committee of Talc Claimants

In re LTL Management, No 23-12825
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 06-01-2023 - 06-30-2023

RE: LTL Management Bankruptcy Official TCC II

Time Details

Date	Professional	Task	Hours	Rate	Amount
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Drafting email communication to M. Reining re Debtor's eleventh production for the motion to dismiss trial.			
06-01-2023	UI	B110 - Case Administration	0.20	485.00	97.00
		Reviewing news article re Anthony Valadez trial circulated by Susan Sieger-Grimm.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.90	485.00	921.50
		Analyzing the scope of the frustration doctrine according to North Carolina state law for the motion to dismiss trial.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Analyzing Debtor's tenth production for the motion to dismiss trial.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
		Discussion with J. Massey on frustration of purpose research for the motion to dismiss trial.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	485.00	679.00
		Analyzing arguments made in TCC's Motion to Dismiss the Second Bankruptcy Petition for the motion to dismiss trial.			
06-01-2023	SD	B190 - Other Contested Matters (excluding assumption / rejection motions)	5.20	500.00	2,600.00
		Analyze arguments raised by debtor in objection to motion to dismiss.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
		Discussion with J. Massey regarding reply and viability of frustration of purpose argument for the motion to dismiss trial.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Drafting email communication to R. Aguirre on Debtor's eleventh production for the motion to dismiss trial.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Discussion with R. Aguirre on Debtor's production for the motion to dismiss trial.			
06-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-01-2023	UI	Drafting email to J. Massey regarding the frustration doctrine for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	485.00	679.00
06-01-2023	UI	Analyzing the scope of the frustration doctrine according to New Jersey state law for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	485.00	339.50
06-01-2023	UI	Analyzing the scope of the frustration doctrine according to federal common law for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-01-2023	UI	Drafting email communication to M. Reining on Debtor's tenth production for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-01-2023	UI	Drafting email communication to R. Aguirre re Debtor's tenth production for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00	242.50
06-01-2023	RSM	Meeting with B. Vallacher to discuss legal strategy for MTD hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-01-2023	RSM	Correspondence with co-counsel re discovery efforts for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	860.00	860.00
06-01-2023	RSM	Reviewed portion of deposition testimony of Kim for purposes of developing factual support for motion to dismiss. B110 - Case Administration	0.70	860.00	602.00
06-01-2023	RSM	Zoom conference with M. Cyganowski, D. Clarke, and FTI personnel re work on submitting committee members' and representatives' costs. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-01-2023	RSM	Communicate with B. Vallacher re coordinating team effort for motion to dismiss work. B160 - Fee/Employment Application	0.40	860.00	344.00
06-01-2023	RSM	Correspondence with co-counsel re supplemental retention applications. B160 - Fee/Employment Application	0.20	860.00	172.00
06-01-2023	RSM	Finalized supplemental retention application papers for filing. B140 - Relief from Stay / Adequate Protection Proceedings	0.20	860.00	172.00
06-01-2023	RSM	Reviewed TCC objection to Debtor's motion for bridge order. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-01-2023	RSM	Reviewed TCC opposition to Debtor's motion to compel. B140 - Relief from Stay / Adequate Protection Proceedings	0.10	860.00	86.00
06-01-2023	BV	Reviewed Debtor's letter submission to the Court in support of its bridge order motion. B190 - Other Contested Matters (excluding assumption / rejection motions)	4.00	775.00	3,100.00
06-01-2023	BV	Reviewing case history and arguments made for the purposes of drafting opposition to stay motion and "bridge" motion, and to appeal prior stay order. B110 - Case Administration	0.50	775.00	387.50
06-01-2023	JSM	Reviewing correspondence among the TCC firms regarding PI and protective order developments. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-01-2023	JSM	Email communication with TCC counsel regarding motion to dismiss briefing. B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00	580.00
06-01-2023	JSM	Reviewing debtor's motion for a bridge order to extend preliminary injunction. B140 - Relief from Stay / Adequate Protection	0.30	1,160.00	348.00

Exhibit A-Statement of Time and Expense Page 4 of 29				Rate	Amount
Date	Professional	Task	Hours	Rate	Amount
		Proceedings			
06-01-2023	JSM	Email communication with TCC counsel re debtor's motion for bridge order. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-01-2023	JSM	Email communication with TCC counsel re motions in limine for MTD trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-01-2023	JSM	Reviewing advice of counsel research for MTD reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-01-2023	JSM	Reviewing frustration of purpose research for MTD reply brief. B140 - Relief from Stay / Adequate Protection Proceedings	0.40	1,160.00	464.00
06-01-2023	JSM	Reviewing successor liability research for opposition to motion to extend PI. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-01-2023	JSM	Email communication with Massey & Gail team regarding motion to dismiss briefing. B190 - Other Contested Matters (excluding assumption / rejection motions)	8.60	1,160.00	9,976.00
06-01-2023	BV	Drafting reply brief in support of motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.50	775.00	387.50
06-01-2023	JSM	Reviewing draft of objections to "bridge" order to provide suggestions. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00	348.00
06-01-2023	RA	Reviewing draft TCC objection to debtor's motion for bridge order. B110 - Case Administration	0.60	320.00	192.00
06-02-2023	RA	Review Debtor's recent document production. B110 - Case Administration	0.40	320.00	128.00
06-02-2023	JSM	Review Debtor's additional recent document production. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-02-2023	JSM	Review research on "manufactured" financial distress for MTD reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-02-2023	JSM	Email communication with Cameron Moxley re Lisman deposition. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-02-2023	BV	Reviewing research on breach of fiduciary duty for MTD reply. B110 - Case Administration	1.80	775.00	1,395.00
06-02-2023	UI	Attending hearing with Chief Judge Kaplan re debtor's motion to extend the automatic stay. B110 - Case Administration	1.80	485.00	873.00
06-02-2023	JSM	Attendance in hearing for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan re debtor's motion to extend the automatic stay. B190 - Other Contested Matters (excluding assumption / rejection motions)	8.20	1,160.00	9,512.00
06-02-2023	JSM	Drafting reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	1,160.00	928.00
06-02-2023	JSM	Zoom with TCC counsel to discuss MTD strategy. B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00	580.00
06-02-2023	JSM	Zoom with Otterbourg team to discuss PI strategy. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
		Phone communication with David Castleman of Otterbourg team to discuss MTD reply.			

Exhibit A-Statement of Time and Expense Page 5 of 29						Rate	Amount
Date	Professional	Task	Hours	Rate	Amount		
06-02-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.40	1,160.00		464.00	
06-02-2023	JSM	Email communication with Otterbourg team to discuss PI strategy. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00		348.00	
06-02-2023	JSM	Email communication with Massey & Gail team to discuss PI strategy. B110 - Case Administration	1.40	1,160.00		1,624.00	
06-02-2023	JSM	Attend bankruptcy court hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00		464.00	
06-02-2023	RSM	Email communication with TCC counsel regarding motion to dismiss briefing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	860.00		430.00	
06-02-2023	RSM	Conference with co-counsel re motion to dismiss strategies. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	860.00		946.00	
06-02-2023	RSM	Reviewed portion of court argument on motion to dismiss discovery disputes. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00		344.00	
06-02-2023	UI	Correspondence with co-counsel re motion to dismiss discovery efforts. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	485.00		436.50	
06-02-2023	UI	Analyzing the scope of the fiduciary duty in the Third Circuit for the motion to dismiss trial. B140 - Relief from Stay / Adequate Protection Proceedings	0.90	485.00		436.50	
06-02-2023	BV	Meeting with co-counsel to discuss forthcoming legal strategy on preliminary injunction. B140 - Relief from Stay / Adequate Protection Proceedings	0.90	775.00		697.50	
06-02-2023	UI	Conferring with co-counsel to discuss forthcoming legal strategy on preliminary injunction. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.70	485.00		824.50	
06-02-2023	BV	Analyzing the scope of the fiduciary duty in all federal jurisdictions for the motion to dismiss trial.. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	775.00		387.50	
06-02-2023	UI	Discussion with U. Ibrahim re motion to dismiss draft. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00		242.50	
06-02-2023	BV	Discussion with B. Vallacher on draft of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	775.00		775.00	
06-02-2023	UI	Conducting legal research in support of our motion to dismiss reply regarding the scope of the good faith inquiry. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	485.00		630.50	
06-02-2023	SD	Analyzing Talc Claimants Motion to Dismiss the Second Bankruptcy Petition of LTL Management, LLC. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.00	500.00		1,000.00	
06-02-2023	UI	Analyze arguments raised by debtor in objection to motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00		242.50	
06-02-2023	UI	Meeting with co-counsel from various firms to discuss legal strategy on the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.80	485.00		873.00	
06-02-2023	UI	Analyzing the scope of the waiver of the attorney-client privilege as it applies to advice of counsel affirmative defense for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00		194.00	

Date	Professional	Task	Hours	Rate	Amount
		Review legal research prepared by B. Vallacher re the scope of attorney-client privileged communications for the motion to dismiss trial.			
06-02-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Review amended agenda for the June 2nd hearing circulated by Susan Sieger-Grimm.			
06-02-2023	BV	B110 - Case Administration	0.70	775.00	542.50
		Reviewing correspondence among the TCC firms regarding PI and protective order developments.			
06-02-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
		Email communication with Massey & Gail team regarding motion to dismiss briefing.			
06-03-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	485.00	533.50
		Analyzing the scope of the fiduciary duty in all federal jurisdictions for the motion to dismiss trial.			
06-03-2023	UI	B110 - Case Administration	0.10	485.00	48.50
		Drafting email communication to R. Aguirre on Debtor's 6.2.23 production.			
06-03-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
		Email communication with TCC counsel regarding motion to dismiss briefing.			
06-03-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	7.40	1,160.00	8,584.00
		Drafting reply brief in support of motion to dismiss.			
06-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	6.10	1,160.00	7,076.00
		Continued drafting reply brief in support of motion to dismiss.			
06-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
		Email communication with TCC counsel regarding motion to dismiss briefing.			
06-04-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.00	485.00	1,940.00
		Continued analyzing the scope of the fiduciary duty in all federal jurisdictions for the motion to dismiss trial.			
06-04-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	0.40	485.00	194.00
		Meeting with co-counsel to discuss forthcoming legal strategy on preliminary injunction.			
06-04-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00	580.00
		Zoom with TCC counsel to discuss PI strategy.			
06-04-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Drafting email communication to J. Massey regarding scope of fiduciary duty research for the motion to dismiss trial.			
06-04-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
		Correspondence with co-counsel and committee representative re motion to dismiss strategy.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00	242.50
		Reviewing June 2023 expert report of Saul E. Burian for the motion to dismiss trial.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00	242.50
		Incorporating research on breach of fiduciary duties to reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	485.00	485.00
		Incorporating research on frustration of purpose to reply in support of motion to dismiss.			
06-05-2023	UI	B110 - Case Administration	0.30	485.00	145.50
		Drafting email communication to R. Aguirre regarding source for the reply in support of the motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50

Date	Professional	Task	Hours	Rate	Amount
		Incorporating research on the manageability of LTL proposed case load to reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Retrieving deposition transcript for J. Massey for incorporation in the reply in support of the motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Incorporating research on the representations the United States Trustee have made in this case to reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	485.00	1,018.50
		Researching record for representations made by the United States Trustee in this case for the reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	485.00	582.00
		Research the applicability of the common interest privilege for the reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00
		Researching record for representations made by Murdica for the reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	485.00	436.50
		Researching record for representations made by TCC regarding the filing of claims for the reply in support of motion to dismiss.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	485.00	582.00
		Researching the significance of forced liquidation in Chapter 11 bankruptcy proceedings.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
		Drafting email to B. Vallacher and M. Layden regarding the significance of forced liquidation in Chapter 11 bankruptcy proceedings.			
06-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	1,160.00	1,276.00
		Reviewing draft report from Saul Burian.			
06-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
		Email communication with Mike Winograd re draft report from Saul Burian.			
06-05-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)	0.30	1,160.00	348.00
		Zoom with TCC counsel to discuss motion to terminate exclusivity.			
06-05-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)	0.20	1,160.00	232.00
		Review revised version of motion to terminate exclusivity.			
06-05-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	485.00	485.00
		Reviewing draft reply of motion to dismiss.			
06-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	7.30	1,160.00	8,468.00
		Drafting reply brief in support of motion to dismiss.			
06-05-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	320.00	128.00
		Review docket and deposition transcripts in preparation of MTD reply.			
06-05-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	11.30	775.00	8,757.50
		Reviewing and revising draft reply brief and instructing U Ibrahim and M. Layden regarding research assignments to complete same.			
06-05-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)	0.30	1,160.00	348.00
		Email communications with TCC counsel to discuss motion to terminate exclusivity.			

Date	Professional	Task	Hours	Rate	Amount
06-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-05-2023	JSM	Email communication with TCC counsel re draft report from Saul Burian.	0.60	1,160.00	696.00
06-05-2023	JSM	B110 - Case Administration	0.20	1,160.00	232.00
06-05-2023	ML	Review draft TCC objection to LTL motion to reimburse AHC fees.	4.60	500.00	2,300.00
06-05-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	500.00	600.00
06-05-2023	ML	Research MDL settlements for use in Motion to Dismiss reply brief.	1.00	500.00	500.00
06-05-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	500.00	650.00
06-05-2023	ML	Analyze authorities cited in draft reply brief in support of motion to dismiss.	1.10	500.00	550.00
06-05-2023	ML	Researching related bankruptcy case for use in Motion to Dismiss reply brief.	0.50	500.00	250.00
06-05-2023	ML	Researching MDM settlements for use in Motion to Dismiss reply brief.	4.90	500.00	2,450.00
06-06-2023	ML	B140 - Relief from Stay / Adequate Protection Proceedings	0.30	500.00	150.00
06-06-2023	ML	Analyzing Debtor's motion for a preliminary injunction.	0.40	500.00	200.00
06-06-2023	ML	Meeting with J. Massey, B. Vallacher, and U. Ibrahim to discuss legal strategy regarding Motion to Dismiss reply brief.	0.40	500.00	200.00
06-06-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-06-2023	JSM	Researching legal precedent re fiduciary breach for use in Motion to Dismiss reply brief.	0.50	1,160.00	580.00
06-06-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-06-2023	JSM	Zoom with TCC counsel to discuss MTD discovery issues.	0.40	1,160.00	464.00
06-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00	348.00
06-06-2023	JSM	Zoom with TCC counsel to discuss PI extension motion by LTL.	0.50	1,160.00	580.00
06-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			
06-06-2023	JSM	Discussion with Massey & Gail team to discuss PI extension motion by LTL.			
06-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			
06-06-2023	JSM	Email communication with TCC counsel to discuss PI extension motion by LTL.			
06-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			
06-06-2023	JSM	Review LTL motion for PI extension.			

Date	Professional	Task	Hours	Rate	Amount
06-06-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.30	775.00	2,557.50
06-06-2023	BV	Revising draft reply brief in support of motion to dismiss (con't). B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	775.00	232.50
06-06-2023	BV	Discussion with U. Ibrahim and M. Layden on procedural posture of, and our next steps in, LTL II. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	775.00	387.50
06-06-2023	BV	Discussion with J. Massey, U. Ibrahim, and M. Layden on procedural posture of, and our next steps in, LTL II. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	775.00	852.50
06-06-2023	BV	Conducting legal research in support of motion to dismiss reply re interplay between reliance on privileged legal advice and good faith. B140 - Relief from Stay / Adequate Protection Proceedings	1.10	775.00	852.50
06-06-2023	JSM	Discussion with co-counsel re objection to preliminary injunction extension/expansion motion. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.40	1,160.00	7,424.00
06-06-2023	RSM	Revising reply brief in support of motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.80	860.00	688.00
06-06-2023	RSM	Conference with co-counsel and committee representatives re preliminary injunction issues. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-06-2023	RSM	Reviewed outline of proof for motion to dismiss trial. B160 - Fee/Employment Application	0.30	860.00	258.00
06-06-2023	JSM	Worked on monthly fee application. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.70	1,160.00	1,972.00
06-06-2023	JSM	Review Wuesthoff deposition transcript for purposes of MTD reply B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	1,160.00	1,276.00
06-06-2023	JSM	Review Nachawati deposition transcript for purposes of MTD reply B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	1,160.00	928.00
06-06-2023	UI	Review Murdica deposition transcript for purposes of MTD reply. B160 - Fee/Employment Application	0.80	485.00	388.00
06-06-2023	UI	Revising fee application for June 2023 entries. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
06-06-2023	UI	Analyzing the TCC's PowerPoint presentation explaining Debtor's plan and TDP. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
06-06-2023	UI	Discussion with B. Vallacher and M. Layden on procedural posture of, and our next steps in, LTL II. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00	242.50
06-06-2023	UI	Discussion with J. Massey, B. Vallacher, and M. Layden regarding draft reply in support of motion to dismiss. B110 - Case Administration	0.30	485.00	145.50
06-06-2023	UI	Discussion with M. Reining re LTL's productions. B110 - Case Administration	0.10	485.00	48.50
06-06-2023	UI	Discussion with R. Aguirre re LTL discovery productions. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.50	485.00	1,212.50
06-06-2023	UI	Researching the scope of the advice of counsel privilege. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50

Exhibit A Statement of Time and Expense Page 10 of 39					
Date	Professional	Task	Hours	Rate	Amount
		Drafting communication to J. Massey, B. Vallacher, and M. Layden regarding the scope of the advice of counsel privilege.			
06-06-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Meeting with B. Vallacher re motion to dismiss.			
06-06-2023	UI	B110 - Case Administration	0.10	485.00	48.50
		Drafting email communication to R. Aguirre on S&P's June 5 production.			
06-06-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	0.70	485.00	339.50
		Analyzing Debtor's motion to extend and modify the preliminary injunction order.			
06-06-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Drafting email to M. Layden regarding scope of fiduciary duty for the motion to dismiss trial.			
06-06-2023	UI	B110 - Case Administration	0.20	485.00	97.00
		Drafting email communication to M. Reining regarding M. Layden and R. Aguirre access to LTL's productions.			
06-06-2023	UI	B110 - Case Administration	0.10	485.00	48.50
		Discussion with J. Massey regarding S&P's June 5 production.			
06-06-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	0.20	485.00	97.00
		Review legal strategy proposed in email communication regarding preliminary injunction.			
06-07-2023	UI	B160 - Fee/Employment Application	0.10	485.00	48.50
		Communicating with R. Morse, B. Vallacher, and J. Massey on filing fee application.			
06-07-2023	UI	B160 - Fee/Employment Application	0.30	485.00	145.50
		Discussion with M. Layden on fee application.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	485.00	582.00
		Discussion with M. Layden on research regarding applicability of Texas two-step in reply brief.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Discussion with M. Layden on forthcoming legal strategy with respect to reply to MTD.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
		Discussion with M. Layden on North Carolina research regarding mutual mistake.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Research regarding the scope of "mutual mistake" in North Carolina.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.60	485.00	1,746.00
		Research regarding the applicability of an implied condition to the 2021 Funding Agreement.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Discussion with R. Aguirre regarding February 17, 2022 transcript from LTL I.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	485.00	533.50
		Meeting with committee to discuss forthcoming legal strategy on motion to dismiss hearing.			
06-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
		Review "mutual mistake" research as contract defense.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.50	485.00	727.50
		Research of the docket in In re Aldrich Pump LLC to support the assertion that the Texas Two-Step is a fraudulent conveyance.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	485.00	388.00
		Discussion with M. Layden re necessity of funding obligations for use in Motion to Dismiss reply brief.			
06-07-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00

Exhibit A Statement of Time and Expense Page 11 of 39					
Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-07-2023	UI	Discussion with M. Layden regarding the applicability of an implied condition to the 2021 Funding Agreement. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00
06-07-2023	JSM	Research of the docket in In re DBMP LLC to support the assertion that the Texas Two-Step is a fraudulent conveyance. B190 - Other Contested Matters (excluding assumption / rejection motions)	7.90	1,160.00	9,164.00
06-07-2023	JSM	Revising reply brief in support of motion to dismiss. B110 - Case Administration	1.10	1,160.00	1,276.00
06-07-2023	JSM	Zoom with TCC members and representatives re next steps and legal strategy. B110 - Case Administration	0.50	1,160.00	580.00
06-07-2023	RSM	Zoom with TCC counsel re next steps and legal strategy. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.90	860.00	1,634.00
06-07-2023	RSM	Reviewed portion of Haas deposition testimony for purposes of developing factual record to support motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-07-2023	RSM	Correspondence with co-counsel re draft expert report. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	860.00	860.00
06-07-2023	RSM	Conference with co-counsel, committee members, and representatives re case developments and strategies, including for the motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
06-07-2023	RSM	Reviewed summary of preliminary injunction extension motion. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-07-2023	RSM	Reviewed summary and analysis of S&P's document production. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
06-07-2023	BV	Confer with colleague re appeal from preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00	310.00
06-07-2023	BV	Reviewing discussion of case strategy in e-mail correspondence to ensure consistency with themes in motion to dismiss reply and district court appeals regarding preliminary injunction and future claim representative. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	775.00	852.50
06-07-2023	BV	Discussing legal research assignment with U. Ibrahim and M. Layden re divisional merger requirements under Texas law and mutual mistake law under North Carolina law. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	775.00	852.50
06-07-2023	BV	Discussing legal research assignment regarding reply in support of motion to dismiss with U. Ibrahim and M. Layden re divisional merger requirements under Texas law and mutual mistake law under North Carolina law. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	775.00	620.00
06-07-2023	BV	Reviewing expert report and providing feedback to J. Massey. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	775.00	852.50
06-07-2023	BV	Conference with co-counsel re case developments and strategies, including preparation for motion to dismiss hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	775.00	232.50
06-07-2023	JSM	Worked on monthly fee application, revising billing descriptions. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00

Date	Professional	Task	Hours	Rate	Amount
		Reviewing draft supplemental responses and objections to LTL Rogs Nos. 2, 4, 10.			
06-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
		Reviewing draft Burian expert report.			
06-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
		Email communication with Mike Winograd re draft Burian expert report.			
06-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
		Reviewing confidential slide from LTL Board presentations ordered by the court to be produced.			
06-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
		Reviewing draft order granting in part/denying in part debtor's motion to compel.			
06-07-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.30	500.00	1,150.00
		Researching issue of state contract law for use in Motion to Dismiss reply brief.			
06-07-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.20	500.00	1,600.00
		Reviewing divisional merger bankruptcy cases for use in Motion to Dismiss reply brief.			
06-07-2023	ML	B110 - Case Administration	1.10	500.00	550.00
		Meeting with committee to discuss forthcoming legal strategy on motion to dismiss hearing.			
06-07-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	500.00	400.00
		Researching legal precedent regarding necessity of funding obligations for use in Motion to Dismiss reply brief.			
06-07-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00
		Discussion with U. Ibrahim regarding necessity of funding obligations for use in Motion to Dismiss reply brief.			
06-07-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	320.00	96.00
		Review docket for hearing transcripts in preparation of MTD reply.			
06-07-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	4.10	775.00	3,177.50
		Conducting legal research, including into local rule requirements, to draft preliminary injunction appeal.			
06-08-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00	310.00
		Discussion with U. Ibrahim and M. Layden on legal research relating to the applicability of the 2021 Funding Agreement outside of bankruptcy proceedings.			
06-08-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	0.40	775.00	310.00
		Conducted legal research re case deadlines in light of conflicting deadline information on the docket.			
06-08-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.10	775.00	3,177.50
		Reviewed and edited reply brief in support of motion to dismiss and provided suggestions to J. Massey.			
06-08-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	775.00	465.00
		Reviewing case filings to draft appeal of appointment of Randi Ellis as Future Claims Representative			
06-08-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	4.30	775.00	3,332.50
		Reviewed and edited objection to debtor's motion to extend and modify the preliminary injunction order.			
06-08-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	5.90	500.00	2,950.00
		Revising draft reply brief in support of motion to dismiss for J. Massey review.			
06-08-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	500.00	300.00
		Revising draft reply brief in support of motion to dismiss.			
06-08-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	500.00	150.00

Exhibit A Statement of Time and Expense Page 13 of 39						Rate	Amount
Date	Professional	Task	Hours	Rate	Amount		
		Discussion with B. Vallacher and M. Layden on legal research relating to the applicability of the 2021 Funding Agreement outside of bankruptcy proceedings.					
06-08-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00		
		Discussion with J. Massey, B. Vallacher, and M. Layden on forthcoming legal strategy for appellate proceedings.					
06-08-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	500.00	100.00		
		Reviewing legal strategy for motion to dismiss proposed in email communication from D. Stolz.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00		
		Reviewing research on mutual mistake for MTD reply.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	1,160.00	696.00		
		Reviewing Mullin expert report for possible use in MTD reply.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00		
		Reviewing Bell expert report for possible use in MTD reply.					
06-08-2023	JSM	B110 - Case Administration	0.20	1,160.00	232.00		
		Revise statement of issues for appeal of order appointing Randi Ellis FCR.					
06-08-2023	JSM	B110 - Case Administration	0.40	1,160.00	464.00		
		Discuss appeal of order appointing Randi Ellis FCR with Bret Vallacher.					
06-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.40	1,160.00	464.00		
		Discuss appeal of PI order with Bret Vallacher.					
06-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00	580.00		
		Reviewing draft TCC objection to LTL motion for extension of PI.					
06-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00	348.00		
		Email communication with TCC counsel re draft TCC objection to LTL motion for extension of PI.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00		
		Reviewing Otterbourg analysis of Mullin report.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00		
		Email communication with TCC counsel re Mullin report.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00		
		Email communication with TCC counsel re Bell report.					
06-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00		
		Reviewing Otterbourg comments on LTL objection to Motion to Dismiss.					
06-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00		
		Correspondence with co-counsel and committee member representatives re LTL's expert disclosures.					
06-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.90	860.00	1,634.00		
		Reviewed portion of Onder deposition testimony for purposes of developing factual support for motion to dismiss.					
06-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00		
		Correspondence with co-counsel re offensive discovery strategy re motion to dismiss.					
06-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00		
		Investigated factual issue re Onder continued involvement in TCC business.					
06-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00		

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-08-2023	RSM	Correspondence with co-counsel re factual investigation of Onder participation in TCC business. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-08-2023	RSM	Analyzed portion of Haas testimony re enforceability of funding agreement. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-08-2023	RA	Reviewed analysis of LTL's expert (Bell) report. B110 - Case Administration	2.20	320.00	704.00
06-08-2023	RA	Review deposition files received from Brown Rudnick. B110 - Case Administration	0.70	320.00	224.00
06-08-2023	JSM	Review briefing re Debtor's motion to appoint R. Ellis as legal representative for future talc claimants. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.50	1,160.00	7,540.00
06-08-2023	UI	Revising reply brief in support of motion to dismiss. B110 - Case Administration	0.60	485.00	291.00
06-08-2023	UI	Review near final draft of Saul E. Burian's June 2023 report. B190 - Other Contested Matters (excluding assumption / rejection motions)	7.30	485.00	3,540.50
06-08-2023	UI	Revising reply in support of motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	485.00	145.50
06-08-2023	UI	Discussion with J. Massey, B. Vallacher, and M. Layden re FCR and PI appeal. B110 - Case Administration	0.30	485.00	145.50
06-08-2023	UI	Drafting email to B. Vallacher on May 3, 2023 hearing before the Honorable Michael B. Kaplan re FCR motion. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
06-08-2023	RA	Discussion with B. Vallacher and M. Layden on legal research relating to the applicability of the 2021 Funding Agreement outside of bankruptcy proceedings. B110 - Case Administration	0.30	320.00	96.00
06-09-2023	RSM	Review Goldman Sach's recent document production. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
06-09-2023	RSM	Correspondence with co-counsel and committee member representatives re preliminary injunction extension briefing. B110 - Case Administration	0.20	860.00	172.00
06-09-2023	RSM	Reviewed response of AHC of supporting counsel to objections to Debtor's motion for order authorizing expense reimbursement agreement. B110 - Case Administration	0.20	860.00	172.00
06-09-2023	RSM	Reviewed Debtor's reply in support of motion for order authorizing expense reimbursement agreement. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
06-09-2023	RSM	Reviewed objection of the US Trustee to Debtor's motion to extend and modify the preliminary injunction order. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00	258.00
06-09-2023	JSM	Reviewed TCC's objection to motion to extend preliminary injunction. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-09-2023	JSM	Reviewing Judge Graham Aearo dismissal for use in MTD reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	1,160.00	1,044.00
06-09-2023	JSM	Reviewing Haas deposition transcript for use in MTD reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	1,160.00	1,508.00
06-09-2023	JSM	Reviewing Kim deposition transcript for use in MTD reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00

Exhibit A Statement of Time and Expense			Page 15 of 39	Hours	Rate	Amount
Date	Professional	Task				
		assumption / rejection motions)				
06-09-2023	JSM	Email communication with TCC counsel re remedies for fraudulent conveyance. B110 - Case Administration		0.20	1,160.00	232.00
06-09-2023	JSM	Email communication with TCC counsel re designation of record for appeal of order appointing Randi Ellis as FCR. B190 - Other Contested Matters (excluding assumption / rejection motions)		6.80	1,160.00	7,888.00
06-09-2023	UI	Revising reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)		3.20	485.00	1,552.00
06-09-2023	UI	Analyzing June 7, 2023 Expert Report of Gregory K. Bell. B190 - Other Contested Matters (excluding assumption / rejection motions)		0.70	485.00	339.50
06-09-2023	ML	Revising draft of reply in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)		2.60	500.00	1,300.00
06-09-2023	ML	Analyzing Debtor's opposition brief to Creditors' Committee's motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)		3.30	500.00	1,650.00
06-09-2023	ML	Analyzing scholarly study regarding mass tort asbestos settlements inside and outside the bankruptcy system. B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	500.00	650.00
06-09-2023	ML	Analyzing Third Circuit's opinion dismissing LTL I for purposes of further developing arguments in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)		1.60	500.00	800.00
06-09-2023	BV	Reviewing Creditors' Committee's motion to dismiss brief. B110 - Case Administration		2.10	775.00	1,627.50
06-09-2023	BV	Review and revise appellant statement of issues on appeal re FCR appointment order B140 - Relief from Stay / Adequate Protection Proceedings		0.90	775.00	697.50
06-09-2023	BV	Reviewed and edited objection to debtor's motion to extend and modify the preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	775.00	232.50
06-09-2023	BV	Reviewing the 3M/Aearo decision for useful language for the motion to dismiss reply. B140 - Relief from Stay / Adequate Protection Proceedings		6.40	775.00	4,960.00
06-10-2023	JSM	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction. B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,160.00	232.00
06-10-2023	JSM	Email communication with Usama Ibrahim re deposition transcripts in MTD proceeding. B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,160.00	464.00
06-11-2023	JSM	Reviewing Bell reliance documents produced by LTL for possible use in MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)		4.30	1,160.00	4,988.00
06-11-2023	JSM	Revising draft reply brief in support of MTD. B195 - Non-Working Travel		2.50	580.00	1,450.00
06-11-2023	UI	Non-working travel to Trenton for court hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)		0.10	485.00	48.50
06-11-2023	RSM	Drafting email communication to J. Massey regarding the depositions conducted in preparation of the motion to dismiss trial. B160 - Fee/Employment Application		0.10	860.00	86.00
06-11-2023	RSM	Reviewed Debtor's objection to TCC professionals' fee applications. B160 - Fee/Employment Application		0.10	860.00	86.00

Exhibit A Statement of Time and Expense Page 16 of 39					
Date	Professional	Task	Hours	Rate	Amount
		Correspondence with colleague re Debtor's objection to TCC professionals' fee applications.			
06-11-2023	RSM	B160 - Fee/Employment Application	0.10	860.00	86.00
		Correspondence with co-counsel re Debtor's objection to TCC professionals' fee applications.			
06-11-2023	BV	B110 - Case Administration	0.20	775.00	155.00
		Reviewing correspondence between committee counsel in preparation for the next day's discovery hearing.			
06-12-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	775.00	387.50
		Discussion with J. Massey, M. Layden, and U. Ibrahim regarding forthcoming legal strategy in preparing for reply to motion to dismiss.			
06-12-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	775.00	232.50
		Reviewing correspondence between committee counsel regarding motion to dismiss strategy.			
06-12-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00	310.00
		Analyzing TCC's Motion to Terminate the Debtor's Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances Thereof.			
06-12-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00	310.00
		Analyzing LTL's objection to the Motion to Terminate the Debtor's Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances.			
06-12-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	775.00	465.00
		Analyzing draft reply in support of the Motion to Terminate the Debtor's Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances to provide feedback regarding draft.			
06-12-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	775.00	465.00
		Reviewing the Ad Hoc Committee of Supporting Counsel's statement of support for purposes of providing insights to A. Silverstein for June 13 oral argument.			
06-12-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	2.10	775.00	1,627.50
		Drafting appeal brief before District of New Jersey Court regarding preliminary injunction.			
06-12-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.30	500.00	1,650.00
		Researching legal issues regarding estoppel for use in Motion to Dismiss reply brief.			
06-12-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.50	500.00	1,750.00
		Meeting with J. Massey, B. Vallacher, and U. Ibrahim re ongoing appellate legal strategy.			
06-12-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	500.00	800.00
		Researching legal issues regarding estoppel for use in Motion to Dismiss reply brief.			
06-12-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00	242.50
		Discussion with J. Massey, M. Layden, and B. Vallacher regarding forthcoming legal strategy in preparing for reply to motion to dismiss.			
06-12-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Discussion with M. Layden regarding applicability of quasi-estoppel doctrine for preservation purposes.			
06-12-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	485.00	339.50
		Research on the scope of quasi-estoppel in the Third Circuit.			
06-12-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Discussion with M. Layden regarding synthesizing research on judicial and quasi-estoppel.			
06-12-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Drafting email to M. Layden regarding research on judicial and quasi estoppel.			
06-12-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00

Exhibit A Statement of Time and Expense			Page 17 of 39	Rate	Amount
Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-12-2023	UI	Drafting email to B. Vallacher regarding frustration of purpose research. B190 - Other Contested Matters (excluding assumption / rejection motions)	4.10	485.00	1,988.50
06-12-2023	UI	Research on the scope of the frustration of purpose doctrine and its applicability to judicial decisions. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.70	485.00	824.50
06-12-2023	UI	Analyzing June 7, 2023 expert report of Charles H. Mullin. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	485.00	388.00
06-12-2023	RSM	Discussion with M. Layden regarding research on judicial estoppel. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	860.00	860.00
06-12-2023	RSM	Reviewed portion of M. Watts deposition testimony for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-12-2023	RSM	Reviewed portion of A. Wong deposition testimony for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-12-2023	RSM	Correspondence with co-counsel re motion to dismiss witness strategy concerns. B160 - Fee/Employment Application	0.10	860.00	86.00
06-12-2023	UI	Correspondence with co-counsel re fee application submission. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
06-12-2023	UI	Discussion with M. Layden regarding research on judicial estoppel for the motion to dismiss trial. B110 - Case Administration	0.30	485.00	145.50
06-12-2023	UI	Review Reply in Support of TCC's Motion to Terminate Exclusivity circulated by Gregory S. Kioian. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.50	485.00	727.50
06-12-2023	JSM	Research on the scope of judicial estoppel in the Third Circuit for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-12-2023	JSM	Email communication with TCC counsel regarding reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.80	1,160.00	7,888.00
06-12-2023	JSM	Revising draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-12-2023	JSM	Communication with Massey & Gail team regarding reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-12-2023	JSM	Reviewing Otterbourg comments on draft MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-13-2023	JSM	Reviewing Dan Stolz comments on draft MTD reply. B110 - Case Administration	4.70	1,160.00	5,452.00
06-13-2023	JSM	Attend hearing in bankruptcy court before Judge Kaplan re disclosure statement scheduling motion to terminate exclusivity, and motion for a bridge order extending the automatic stay to non-debtor parties. B110 - Case Administration	1.50	1,160.00	1,740.00
06-13-2023	JSM	Meet with TCC representatives and counsel in connection with hearing in bankruptcy court before Judge Kaplan. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.70	1,160.00	1,972.00
		Revising draft reply brief in support of motion to dismiss.			

Date	Professional	Task	Hours	Rate	Amount
06-13-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-13-2023	JSM	Email communication with TCC counsel regarding reply brief in support of motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.20	1,160.00	232.00
06-13-2023	RA	Email communication with Massey & Gail team regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	320.00	672.00
06-13-2023	UI	Review TCC motion to dismiss and Debtor's opposition to same. B110 - Case Administration	4.50	485.00	2,182.50
06-13-2023	BV	Attendance in hearing for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan re disclosure statement scheduling motion, motion to terminate exclusivity, and motion for a bridge order extending the automatic stay to non-debtor parties. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	775.00	232.50
06-13-2023	UI	Worked on monthly fee application, revising billing descriptions. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-13-2023	UI	Review Objection of the Ad Hoc Committee of Supporting Counsel to Motion to Terminate the Debtor's Exclusive Period circulated by Daniel M. Stolz, Esq. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-13-2023	UI	Discussion with B. Vallacher regarding June 13, 2023 hearing before the Honorable Michael B. Kaplan. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	485.00	339.50
06-13-2023	RA	Analyzing June 2023 expert report of Saul E. Burian. B110 - Case Administration	0.20	320.00	64.00
06-13-2023	JSM	Review Bernstein production documents. B195 - Non-Working Travel	3.50	580.00	2,030.00
06-13-2023	ML	Non-working travel from Trenton to Washington, DC, returning from court hearing. B110 - Case Administration	4.30	500.00	2,150.00
06-13-2023	ML	Attending hearing regarding PI order. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	500.00	550.00
06-13-2023	ML	Discussion with B. Vallacher and M. Layden regarding June 13, 2023 hearing before the Honorable Michael B. Kaplan. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	500.00	1,050.00
06-13-2023	BV	Reviewing expert report of G. Bell. B110 - Case Administration	4.50	775.00	3,487.50
06-13-2023	BV	Attendance in hearing for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan re disclosure statement scheduling motion, motion to terminate exclusivity, and motion for a bridge order extending the automatic stay in non-debtor parties. B140 - Relief from Stay / Adequate Protection Proceedings	3.20	775.00	2,480.00
06-13-2023	BV	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction. B140 - Relief from Stay / Adequate Protection Proceedings	1.10	775.00	852.50
06-13-2023	UI	Drafting suggested changes to course of action regarding preliminary injunction appeal as a result of Chief Judge Kaplan's ruling during the 6/13 hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	485.00	533.50
06-13-2023	RSM	Discussion with B. Vallacher and M. Layden regarding June 13, 2023 hearing before the Honorable Michael B. Kaplan. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
		Correspondence with co-counsel and counsel for other interested parties re witness for motion to dismiss trial.			

Date	Professional	Task	Hours	Rate	Amount
06-13-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-13-2023	RSM	Correspondence with co-counsel re exclusivity motion. B140 - Relief from Stay / Adequate Protection Proceedings	0.20	860.00	172.00
06-13-2023	RSM	Reviewed AHC's statement in support of Debtor's motion to extend and modify the preliminary injunction order. B140 - Relief from Stay / Adequate Protection Proceedings	3.00	860.00	2,580.00
06-13-2023	RSM	Reviewed portion of argument on Debtor's motion to extend and modify preliminary injunction order and TCC's motion to terminate exclusivity. B140 - Relief from Stay / Adequate Protection Proceedings	0.10	860.00	86.00
06-13-2023	RSM	Reviewed Maune Raichle objection to motion to extend and modify preliminary injunction. B110 - Case Administration	0.10	860.00	86.00
06-13-2023	RSM	Reviewed TCC reservation of rights re Debtor's motion to waive requirement of Rule 3003. B110 - Case Administration	0.10	860.00	86.00
06-13-2023	RSM	Reviewed Debtor's motion to waive requirement of Rule 3003. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-13-2023	UI	Correspondence with co-counsel re preparatory work for motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-14-2023	BV	Review Reply in Support of Motion of the Official Committee of Talc Claimants to Terminate the Debtor's Exclusive Period Pursuant to 11 U.S.C. § 1121(d)(1) circulated by Gregory S. Kinoian. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	775.00	775.00
06-14-2023	UI	Conference with committee members, co-counsel, and representatives re case developments and strategies, including for the preliminary injunction and motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	485.00	485.00
06-14-2023	RA	Meeting with committee to discuss forthcoming legal strategy on motion to dismiss hearing. B160 - Fee/Employment Application	0.40	320.00	128.00
06-14-2023	UI	Revise April 14, 2023 - May 31, 2023 fee application. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
06-14-2023	UI	Discussion with M. Layden regarding research on the applicability of New Jersey fraudulent conveyance claim in federal bankruptcy proceeding. B320 - Plan and Disclosure Statement (including Business Plan)	0.40	485.00	194.00
06-14-2023	BV	Discussion with B. Vallacher and M. Layden on legal strategy regarding Debtor's proposed plan. B320 - Plan and Disclosure Statement (including Business Plan)	0.40	775.00	310.00
06-14-2023	UI	Discussion with U. Ibrahim and M. Layden on legal strategy regarding Debtor's proposed plan. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00
06-14-2023	UI	Meeting with M. Layden re case strategy for appeal process. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	485.00	679.00
06-14-2023	ML	Preparing exhibit material for filing with the reply to the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	500.00	400.00
06-14-2023	ML	Meeting with J. Massey, B. Vallacher, and U. Ibrahim regarding legal strategy after hearing on PI and exclusivity. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.70	500.00	850.00
06-14-2023	ML	Drafting portion of reply brief re exhibits in support. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	500.00	350.00

Exhibit A Statement of Time and Expense			Page 20 of 39	Rate	Amount
Date	Professional	Task	Hours		
		assumption / rejection motions)			
06-14-2023	ML	Attending call with co-counsel for the TCC regarding motion to dismiss trial strategy. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	500.00	500.00
06-14-2023	ML	Attending weekly committee meeting with attorney and committee members regarding motion to dismiss trial strategy. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	500.00	1,300.00
06-14-2023	ML	Researching state law precedent regarding fraudulent transfers. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	500.00	450.00
06-14-2023	UI	Discussing state law issues regarding fraudulent transfers. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.20	485.00	1,552.00
06-14-2023	BV	Reviewing and revising draft of reply in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	775.00	620.00
06-14-2023	BV	Meeting with J. Massey, M. Layden, and U. Ibrahim re case strategy for appeal process. B140 - Relief from Stay / Adequate Protection Proceedings	4.40	775.00	3,410.00
06-14-2023	UI	Analyzing preliminary injunction briefs before bankruptcy court to draft appeal brief before District of New Jersey Court regarding preliminary injunction. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	485.00	388.00
06-14-2023	UI	Meeting with J. Massey, B. Vallacher, and M. Layden re case strategy for appeal process. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	485.00	388.00
06-14-2023	BV	Meeting with co-counsel to discuss forthcoming legal strategy on motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	775.00	620.00
06-14-2023	JSM	Conference with co-counsel re case developments and strategies, including preparation for motion to dismiss hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-14-2023	JSM	Email communication with TCC counsel regarding reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.50	1,160.00	7,540.00
06-14-2023	JSM	Revising draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-14-2023	JSM	Communication with Massey & Gail team regarding reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-14-2023	JSM	Reviewing Prof Rave rebuttal expert report in support of motion to dismiss. B110 - Case Administration	0.60	1,160.00	696.00
06-14-2023	JSM	Zoom with TCC counsel regarding legal strategy and next steps. B110 - Case Administration	1.10	1,160.00	1,276.00
06-14-2023	JSM	Zoom with TCC representatives regarding legal strategy and next steps. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-14-2023	JSM	Zoom with TCC counsel regarding MTD trial and logistics. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-14-2023	JSM	Reviewing 341 hearing transcript for use in MTD reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
		Reviewing draft Burian rebuttal report.			

Date	Professional	Task	Hours	Rate	Amount
06-14-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-14-2023	JSM	Email communication with Mike Winograd re draft Burian rebuttal report. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-14-2023	JSM	Reviewing documents produced by S&P for possible use in MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-14-2023	JSM	Reviewing documents produced by JPMorgan for possible use in MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-14-2023	RSM	Reviewing documents produced by Bernstein for possible use in MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.90	860.00	1,634.00
06-14-2023	RSM	Reviewed portion of Pulaski deposition testimony for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	860.00	602.00
06-14-2023	RSM	Conference with co-counsel re preparatory work and strategies for motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	860.00	774.00
06-15-2023	UI	Conference with committee member representatives and co-counsel re case developments and priorities, including facts developed during depositions re motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
06-15-2023	BV	Discussion with R. Aguirre regarding the preparation of declaration for the reply in support of the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00	310.00
06-15-2023	RSM	Instructing U. Ibrahim and M. Layden re proposed findings of fact and conclusions of law concerning motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-15-2023	RSM	Correspondence with co-counsel re additional factual arguments for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-15-2023	RSM	Analyzed portion of LTL's board materials re decision to file second bankruptcy. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-15-2023	RSM	Correspondence with co-counsel re draft expert reports. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-15-2023	RSM	Reviewed draft expert presentation. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-15-2023	RSM	Analyzed Debtor's arguments re exclusivity. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-15-2023	RSM	Correspondence with co-counsel re LTL's proposed stipulation for admission of evidence at trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-15-2023	JSM	Analyzed AHC's arguments in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-15-2023	JSM	Zoom with TCC counsel re post-trial findings of fact and conclusions of law. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00

Date	Professional	Task	Hours	Rate	Amount
06-15-2023	JSM	Communication with Massey & Gail team regarding reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	5.90	1,160.00	6,844.00
06-15-2023	JSM	Revising draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-15-2023	JSM	Email communication with TCC counsel regarding reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-15-2023	JSM	Email communication with TCC counsel re assignment of witnesses for MTD trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-15-2023	JSM	Email communication with TCC counsel re stipulation of procedure with debtor. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	1,160.00	928.00
06-15-2023	JSM	Reviewing Watts deposition transcript for MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	1,160.00	812.00
06-15-2023	JSM	Reviewing Pulaski deposition transcript in connection with drafting MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-15-2023	JSM	Reviewing Wong deposition transcript in connection with drafting MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	1,160.00	928.00
06-15-2023	JSM	Reviewing Onder deposition transcript in connection with drafting MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-15-2023	JSM	Reviewing final Burian expert rebuttal report in connection with drafting MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-15-2023	JSM	Reviewing Mullin expert rebuttal report in connection with drafting MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-15-2023	JSM	Reviewing Birnbaum expert rebuttal report in connection with drafting MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-15-2023	JSM	Email communication with Dan Stolz in connection with MTD reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-15-2023	RA	Email communication with TCC counsel re post-trial findings of fact and conclusions of law. B110 - Case Administration	1.20	320.00	384.00
06-15-2023	UI	Review Bankr. D.N.J. docket for various briefing and hearing transcripts for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	5.40	485.00	2,619.00
06-15-2023	BV	Preparing exhibit material for filing with the reply to the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	775.00	542.50
06-15-2023	UI	Conference with co-counsel re briefing proposed findings of fact and conclusions of law concerning motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00
06-15-2023	ML	Drafting email communication to J. Massey re depositions undertaken for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	500.00	600.00
06-15-2023	BV	Reviewing expert report of G. Bell. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	775.00	155.00

Date	Professional	Task	Hours	Rate	Amount
		Drafting workplan re briefing proposed findings of fact and conclusions of law concerning motion to dismiss trial for S. Beville review.			
06-15-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Discussion with J. Massey, B. Vallacher, and M. Layden regarding strategy for drafting finding of fact and conclusion of law.			
06-15-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Discussion with M. Layden regarding the preparation of declaration for the reply in support of the motion to dismiss.			
06-15-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00
		Discussion with J. Massey, B. Vallacher, and U. Ibrahim regarding drafting findings of fact and conclusions of law.			
06-15-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	500.00	100.00
		Discussion with U. Ibrahim regarding preparing exhibits for reply brief in support of Motion to Dismiss.			
06-15-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.40	500.00	1,200.00
		Preparing exhibits for reply brief in support of motion to dismiss.			
06-15-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	1.90	775.00	1,472.50
		Analyzing preliminary injunction briefs before bankruptcy court to draft appeal brief before District of New Jersey Court regarding preliminary injunction.			
06-16-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	320.00	832.00
		Review law cited in MTD second bankruptcy petition briefing.			
06-16-2023	JSM	B160 - Fee/Employment Application	0.30	1,160.00	348.00
		Email communication with TCC counsel re proposed PI order.			
06-16-2023	JSM	B160 - Fee/Employment Application	0.30	1,160.00	348.00
		Reviewing TCC preliminary exhibit list for MTD trial.			
06-16-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	1,160.00	928.00
		Email communication with TCC counsel regarding reply brief in support of motion to dismiss.			
06-16-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	5.80	1,160.00	6,728.00
		Revising draft reply brief in support of motion to dismiss.			
06-16-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
		Communication with Massey & Gail team regarding reply brief in support of motion to dismiss.			
06-16-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	1.90	775.00	1,472.50
		Revising proposed preliminary injunction order, including to incorporate feedback from co-counsel.			
06-16-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	500.00	250.00
		Reviewing legal strategy in email communication for motion to dismiss.			
06-16-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	3.90	775.00	3,022.50
		Analyzing preliminary injunction briefs before bankruptcy court to draft appeal brief before District of New Jersey Court regarding preliminary injunction.			
06-16-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00	310.00
		Analyzing hearing transcripts to resolve conflicting dates regarding deadlines for the filing of the reply in support of the motion to dismiss.			
06-16-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	500.00	800.00
		Reviewing expert report of G. Bell.			

Date	Professional	Task	Hours	Rate	Amount
06-16-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.40	500.00	1,200.00
06-16-2023	ML	Analyzing rebuttal expert report of C. Mullin.	1.70	500.00	850.00
06-16-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	500.00	500.00
06-16-2023	UI	Searching the record to identify deadline for reply brief.	1.00	485.00	485.00
06-16-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-16-2023	UI	Drafting email to J. Massey regarding outstanding deposition transcript.	0.10	485.00	48.50
06-16-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
06-16-2023	UI	Discussion with B. Vallacher regarding May 30, 2023 hearing before the Honorable Michael B. Kaplan.	1.40	485.00	679.00
06-16-2023	UI	Preparing exhibit material for filing with the reply to the motion to dismiss.	1.20	485.00	582.00
06-17-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-17-2023	JSM	Email communication with TCC counsel regarding legal arguments to include in MTD trial.	1.70	1,160.00	1,972.00
06-19-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-19-2023	JSM	Email communication with TCC counsel re draft reply brief in support of motion to dismiss.	0.20	1,160.00	232.00
06-19-2023	JSM	Email communication with TCC representatives re draft reply brief in support of motion to dismiss.	0.80	1,160.00	928.00
06-19-2023	UI	Revising draft reply brief in support of motion to dismiss.	0.50	485.00	242.50
06-19-2023	UI	Discussion with M. Layden regarding revisions to draft of reply in support of motion to dismiss.	0.30	485.00	145.50
06-19-2023	BV	B110 - Case Administration	1.10	775.00	852.50
06-19-2023	BV	Reviewing debtor's reply in support of its motion to extend the preliminary injunction (in response to objections from Cohen Placitella) to inform appeal of preliminary injunction order to District Court.	0.40	775.00	310.00
06-19-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.10	320.00	992.00

Date	Professional	Task	Hours	Rate	Amount
		Review and revise TCC draft reply in support of MTD.			
06-19-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.80	320.00	1,536.00
		Analyze case law in support of TCC draft reply in support of MTD.			
06-19-2023	UI	B110 - Case Administration	0.60	485.00	291.00
		Reviewing Clay Thompson's outline of his reply brief on the MTD as circulated by J. Massey.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.30	485.00	1,115.50
		Revising exhibit list for reply brief in support of the motion to dismiss.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Discussion with M. Layden and R. Aguirre re exhibits in support of reply brief in support of the motion to dismiss.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	8.20	485.00	3,977.00
		Revising the reply in support of the motion to dismiss.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	485.00	242.50
		Discussion with M. Layden re exhibit list of the reply in support of the motion to dismiss.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00
		Reviewing revised exhibit list circulated by M. Layden for the reply in support of the motion to dismiss.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
		Drafting email communication to J. Massey re outstanding deposition transcript for the motion to dismiss trial.			
06-20-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
		Drafting email communication to R. Aguirre re finalizing the reply in support of the motion to dismiss.			
06-20-2023	RA	B140 - Relief from Stay / Adequate Protection Proceedings	0.40	320.00	128.00
		Draft opposition to preliminary injunction.			
06-20-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	320.00	448.00
		Review MTD trial exhibits.			
06-20-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.30	320.00	1,056.00
		Continue to review and revise TCC draft reply in support of MTD.			
06-20-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	8.00	320.00	2,560.00
		Continue to review legal authorities in support of TCC draft reply in support of MTD.			
06-20-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	6.60	775.00	5,115.00
		Analyzing preliminary injunction briefs before bankruptcy court to draft appeal brief before District of New Jersey Court regarding preliminary injunction.			
06-20-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	5.10	500.00	2,550.00
		Revising reply brief in support of Motion to Dismiss.			
06-20-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	775.00	387.50
		Discussing plan to draft post-trial Findings of Fact and Conclusions of Law with co-counsel.			
06-20-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	500.00	250.00
		Discussion with U. Ibrahim re reply brief in support of motion to dismiss exhibit list.			
06-20-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	500.00	100.00
		Preparing email communication to J. Massey re exhibits for reply brief.			
06-20-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	775.00	155.00

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-20-2023	BV	Advising U. Ibrahim and M. Layden re finalizing motion to dismiss reply; B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	775.00	155.00
06-20-2023	ML	Corresponding with L. Benson re finalizing trial exhibit numbers for inclusion in motion to dismiss reply. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.50	500.00	1,750.00
06-20-2023	BV	Revising reply brief in support of motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.90	775.00	697.50
06-20-2023	BV	Conducting legal research re legal standards to draft appeal brief before District of New Jersey Court regarding preliminary injunction. B140 - Relief from Stay / Adequate Protection Proceedings	0.50	775.00	387.50
06-20-2023	RSM	Analyzing order/opinion of bankruptcy court to draft appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
06-20-2023	RSM	Correspondence with co-counsel re potential trial exhibits. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
06-20-2023	ML	Correspondence with co-counsel re stipulation re evidentiary boundaries for trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.50	500.00	1,250.00
06-20-2023	ML	Revising exhibit list for reply brief in support of Motion to Dismiss., B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00
06-20-2023	JSM	Conference with U. Ibrahim and R. Aguirre regarding revising exhibit citation in reply brief in support of Motion to Dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-20-2023	JSM	Zoom with TCC counsel re post-trial findings of fact and conclusions of law. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.20	1,160.00	3,712.00
06-20-2023	JSM	Revising draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-20-2023	JSM	Zoom with TCC counsel regarding findings of fact/conclusions of law in connection with MTD trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-20-2023	JSM	Reviewing Bell supplemental expert report in connection with draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-20-2023	JSM	Teleconference with Mike Winograd re Bell supplemental expert report in connection with draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-20-2023	JSM	Teleconference with Mike Winograd re Bell supplemental expert report in connection with draft reply brief in support of motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.20	1,160.00	232.00
06-20-2023	JSM	Reviewing TCC supplemental objection to Kenvue/Janssen extension of PI. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-20-2023	JSM	Email communication with Massey & Gail team re draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00

Exhibit A Statement of Time and Expense Page 27 of 39						Rate	Amount
Date	Professional	Task	Hours	Rate	Amount		
06-21-2023	ML	Email communication with TCC counsel re draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	500.00	150.00		
06-21-2023	JSM	Discussing confidentiality designations for reply in support of motion to dismiss with J. Massey and U. Ibrahim. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00		
06-21-2023	BV	Email communication with TCC counsel re draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.70	775.00	5,192.50		
06-21-2023	ML	Revising motion to appoint Kenneth Feinberg as expert witness. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	500.00	600.00		
06-21-2023	JSM	Attending weekly TCC committee meeting. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00		
06-21-2023	JSM	Email communication with Massey & Gail team re draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00		
06-21-2023	UI	Teleconference with Massey & Gail team re draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00	194.00		
06-21-2023	UI	Discussion with M. Layden regarding confidentiality designations relating to the reply in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50		
06-21-2023	ML	Discussion with J. Massey and M. Layden regarding finalization of reply in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.10	500.00	1,550.00		
06-21-2023	JSM	Revising draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00		
06-21-2023	BV	Email communication with TCC representatives re draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	775.00	542.50		
06-21-2023	ML	Discussing finalization of reply in support of motion to dismiss with M. Layden and U. Ibrahim. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00		
06-21-2023	ML	Discussion with U. Ibrahim re confidentiality designations for reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	500.00	350.00		
06-21-2023	UI	Discussing finalization of reply in support of motion to dismiss with B. Vallacher and U. Ibrahim. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50		
06-21-2023	UI	Drafting instructions for R. Aguirre and J. Moran re finalizing the reply in support of the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	4.70	485.00	2,279.50		
06-21-2023	ML	Revising draft of the reply in support of the MTD to incorporate confidentiality designations. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	500.00	150.00		
06-21-2023	UI	Discussion with U. Ibrahim and R. Aguirre regarding Stolz declaration in support of the reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50		
06-21-2023	UI	Call with R. Aguirre regarding preparation of declaration in support of MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	485.00	485.00		
06-21-2023	UI	Revising draft of the reply in support of the MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50		

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-21-2023	ML	Researching the status of the stay in the MDL proceeding. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.00	500.00	1,500.00
06-21-2023	JSM	Redacting reply brief in support of motion to dismiss per confidentiality designations. B110 - Case Administration	1.10	1,160.00	1,276.00
06-21-2023	JSM	Zoom with TCC members, representatives, and counsel regarding legal strategy and next steps. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.70	1,160.00	3,132.00
06-21-2023	UI	Revising draft reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	485.00	339.50
06-21-2023	BV	Discussing finalization of reply in support of motion to dismiss with M. Layden and U.Ibrahim B140 - Relief from Stay / Adequate Protection Proceedings	2.30	775.00	1,782.50
06-21-2023	ML	Analyzing opinion of bankruptcy court to draft appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	500.00	650.00
06-21-2023	ML	Revising reply brief to motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.80	500.00	900.00
06-21-2023	BV	Cite checking revised version of reply brief in support of TCC motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	0.10	775.00	77.50
06-21-2023	BV	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order. B140 - Relief from Stay / Adequate Protection Proceedings	0.50	775.00	387.50
06-21-2023	ML	Analyzing demonstrative presented to Bankruptcy Court to certify preliminary injunction appeal in LTL 1.0 to draft appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	500.00	250.00
06-21-2023	BV	Meeting with U. Ibrahim to discuss revision to reply brief in support of motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	775.00	930.00
06-21-2023	UI	Conference with committee members, co-counsel, and representatives re case developments and strategies, including for the preliminary injunction and motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	485.00	582.00
06-21-2023	UI	Meeting with committee to discuss forthcoming legal strategy on motion to dismiss hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	485.00	533.50
06-21-2023	UI	Discussion with M. Layden discussing revisions to the reply in support of the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	485.00	776.00
06-21-2023	UI	Modifying draft of the reply in support of the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.90	485.00	921.50
06-21-2023	UI	Incorporating J. Massey and M. Layden's edit to draft of the reply in support of the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	485.00	1,261.00
06-21-2023	SD	Reviewing draft of reply in support of the motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	1.40	500.00	700.00
06-21-2023	RA	Analyze whether irreparable harm necessary for award of preliminary injunction requires more than monetary harm. B190 - Other Contested Matters (excluding	7.20	320.00	2,304.00

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-21-2023	RSM	Continue to cite check TCC draft reply in support of MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	860.00	946.00
06-21-2023	RSM	Reviewed portion of deposition testimony of K. Bell for purposes of developing support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
06-21-2023	RA	Correspondence with LTL's counsel re trial stipulation. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	320.00	832.00
06-21-2023	RA	Finalize exhibits to be included in reply MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	320.00	672.00
06-22-2023	JSM	Execute addition proof of final TCC reply in support of MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,160.00	464.00
06-22-2023	JSM	Email communication with TCC counsel re reply brief in support of MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-22-2023	BV	Email communication with Massey & Gail team re reply brief in support of MTD. B140 - Relief from Stay / Adequate Protection Proceedings	0.80	775.00	620.00
06-22-2023	JSM	Analyzing recent caselaw developments to inform draft of appeal brief before District of New Jersey Court regarding preliminary injunction order. B140 - Relief from Stay / Adequate Protection Proceedings	0.20	1,160.00	232.00
06-22-2023	JSM	Teleconference with Adam Silverstein re preparation for June 22 court hearing. B140 - Relief from Stay / Adequate Protection Proceedings	2.80	1,160.00	3,248.00
06-22-2023	JSM	Attend bankruptcy court hearing on Kenvue/Janssen issues. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-22-2023	JSM	Review transcript of Royal deposition in preparation for MTD trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	1,160.00	812.00
06-22-2023	UI	Review transcript of Rave deposition in preparation for MTD trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
06-22-2023	ML	Discussion with M. Layden regarding research assignment of proceedings before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.70	500.00	1,350.00
06-22-2023	UI	Attending June 22, 2023, 1:30 pm EST hearing before Judge Kaplan re debtor's motion order extending automatic stay to non-debtor parties.. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	485.00	776.00
06-22-2023	RA	Review of October 20, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	320.00	256.00
06-22-2023	JSM	Finalize MTD reply, declaration, and exhibits for filing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-22-2023	JSM	Email communication with Genova Burns re reply brief in support of MTD. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
		Revising Stolz declaration ISO reply brief in support of motion to dismiss.			

Date	Professional	Task	Hours	Rate	Amount
06-22-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.20	1,160.00	232.00
06-22-2023	UI	Email communication with TCC counsel re Janssen and Kenvue in preparation for June 22 court hearing.	0.30	485.00	145.50
06-22-2023	UI	Reviewing ad hoc committee of states holding consumer protection claims' reply in support of its motion to dismiss the chapter 11 case circulated by Harriet E. Cohen.	0.30	485.00	145.50
06-22-2023	UI	Reviewing reply of the U.S. Trustee to Debtor's omnibus objection to the motion to dismiss circulated by Harriet E. Cohen.	0.20	485.00	97.00
06-22-2023	UI	Reviewing Reorg research document circulated by David J. Molton re preliminary injunction.	2.30	485.00	1,115.50
06-22-2023	UI	Revising citations in draft of reply in support of motion to dismiss.	0.80	485.00	388.00
06-22-2023	UI	Finalizing exhibit of reply in support of motion to dismiss.	0.70	485.00	339.50
06-22-2023	UI	Drafting email communication to J. Massey regarding final draft of reply in support of motion to dismiss.	0.40	485.00	194.00
06-22-2023	UI	Discussion with M. Layden regarding finalizing reply in support of the motion dismiss.	0.10	485.00	48.50
06-22-2023	UI	Reviewing ad hoc group of Meso claimants' joinder to motion to dismiss the second bankruptcy petition circulated by Harriet E. Cohen.	0.50	485.00	242.50
06-22-2023	UI	Drafting email communication with M. Reining regarding finalizing the draft reply in support of the motion to dismiss' confidentiality designations.	0.10	485.00	48.50
06-22-2023	UI	Drafting email communication to J. Massey regarding deposition transcript.	1.60	485.00	776.00
06-22-2023	BV	Discussion with M. Layden regarding finalizing the reply in support of the motion to dismiss.	0.90	775.00	697.50
06-22-2023	UI	Analyzing deposition testimony of Judge Royal Ferguson.	0.40	485.00	194.00
06-22-2023	BV	Finalizing reply in support of motion to dismiss.	0.10	775.00	77.50
06-22-2023	BV	Coordinating finalization of reply in support of motion to dismiss with M. Layden and U. Ibrahim.	0.40	775.00	310.00
06-22-2023	BV	Reviewing draft motion to seal re reply in support of motion to dismiss.	0.30	775.00	232.50
06-22-2023	SD	Conducting legal research regarding irreparable harm to include in appeal brief before District of New Jersey Court regarding preliminary injunction order.	2.10	500.00	1,050.00

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
		Analyze third circuit case law regarding what constitutes a harm in evaluating the merits of an injunction in the bankruptcy context.			
06-22-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	775.00	2,015.00
		Attending hearing for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan re debtor's motion order extending automatic stay to non-debtor parties..			
06-22-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	485.00	1,261.00
		Attendance in hearing for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan re debtor's motion order extending automatic stay to nondebtor parties.			
06-22-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	500.00	400.00
		Discussion with U. Ibrahim regarding finalization of reply brief in support of motion to dismiss.			
06-22-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	1,160.00	1,508.00
		Revising draft reply brief in support of motion to dismiss.			
06-22-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	3.90	775.00	3,022.50
		Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order.			
06-22-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.60	500.00	1,800.00
		Revising reply brief in support of motion to dismiss.			
06-22-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	500.00	600.00
		Marking exhibits to reply brief for confidentiality.			
06-23-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
		Email communication with TCC counsel re Mullin testimony in connection with MTD.			
06-23-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.80	1,160.00	2,088.00
		Review transcript of Bell deposition in preparation for MTD trial.			
06-23-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	775.00	852.50
		Analyzing direct declaration of J. Kim produced by debtor in connection with the motion to dismiss trial for the purposes of informing trial strategy.			
06-23-2023	BV	B140 - Relief from Stay / Adequate Protection Proceedings	6.80	775.00	5,270.00
		Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order.			
06-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
		Reviewing Saul E. Burian June 22, 2023 deposition transcript circulated by Michael S. Winograd for the motion to dismiss trial.			
06-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
		Review of October 20, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial.			
06-23-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.90	500.00	1,950.00
		Analyzing hearing transcript from Debtor's original North Carolina bankruptcy filing in support of post-trial briefing.			
06-23-2023	SD	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	500.00	350.00
		Analyze third circuit case law regarding presumption of jurisdiction.			
06-23-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
		Correspondence with co-counsel re LTL's fact witness declarations in opposition to motion to dismiss.			

Date	Professional	Task	Hours	Rate	Amount
06-23-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
06-24-2023	BV	Correspondence with member representative re LTL 1.0 motion to dismiss decision. B140 - Relief from Stay / Adequate Protection Proceedings	0.40	775.00	310.00
06-24-2023	BV	Drafted workplan for the preliminary injunction and future claimant representative appeal briefs before District of New Jersey Court. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	775.00	852.50
06-24-2023	BV	Reviewing correspondence from co-counsel for developments to craft potential responses. B140 - Relief from Stay / Adequate Protection Proceedings	1.80	775.00	1,395.00
06-24-2023	BV	Preparing notice of appeal for new preliminary injunction order to the District of New Jersey. B140 - Relief from Stay / Adequate Protection Proceedings	0.40	775.00	310.00
06-24-2023	BV	Corresponding with J. Massey re appellate strategies and arguments. B140 - Relief from Stay / Adequate Protection Proceedings	5.10	775.00	3,952.50
06-24-2023	UI	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	485.00	776.00
06-24-2023	JSM	Review of October 20, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-24-2023	JSM	Email communication with TCC counsel re arguments in connection with MTD hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00
06-24-2023	JSM	Email communication with TCC representatives re arguments in connection with MTD hearing. B140 - Relief from Stay / Adequate Protection Proceedings	0.20	1,160.00	232.00
06-25-2023	JSM	Email communication with M&G team regarding PI appeal. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00	348.00
06-25-2023	BV	Email communication with M&G team re MTD trial. B140 - Relief from Stay / Adequate Protection Proceedings	7.10	775.00	5,502.50
06-25-2023	ML	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.40	500.00	1,200.00
06-25-2023	RSM	Analyzing hearing transcript from Debtor's original bankruptcy filing the Western District of North Carolina. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00	86.00
06-25-2023	RSM	Reviewed J. Lamken's analysis of Bestwall Fourth Circuit decision. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00	172.00
06-25-2023	RSM	Reviewed committee member representative's analysis re support for litigation advantage argument on motion to dismiss. B160 - Fee/Employment Application	2.30	860.00	1,978.00
06-25-2023	RSM	Worked on monthly fee application for May services. B160 - Fee/Employment Application	0.20	860.00	172.00
06-26-2023	BV	Correspondence with colleague re monthly fee application for May services. B140 - Relief from Stay / Adequate Protection Proceedings	8.60	775.00	6,665.00
06-26-2023	UI	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	5.60	485.00	2,716.00

Exhibit A Statement of Time and Expense Page 33 of 39						Rate	Amount
Date	Professional	Task	Hours	Rate	Amount		
		Review of October 20, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial.					
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.30	500.00			2,150.00
		Analyzing hearing transcript from Debtor's original bankruptcy filing the Western District of North Carolina.					
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	500.00			300.00
		Discussion with U. Ibrahim re creating PI appeal appendix.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00			97.00
		Discussion with M. Layden and R. Aguirre regarding the preparation of an appellate appendix with revised citations for the PI appeal.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00			145.50
		Discussion with M. Layden regarding the preparation of an appellate appendix with revised citations for the PI appeal.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00			145.50
		Meeting with counsel to discuss pre-trial litigation strategy.					
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	500.00			150.00
		Attending movant's conference re motion to dismiss hearing.					
06-26-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	775.00			155.00
		Reviewing correspondence from co-counsel for developments to craft potential responses.					
06-26-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	775.00			310.00
		Conference in war room with co-counsel re trial strategy planning.					
06-26-2023	ML	B140 - Relief from Stay / Adequate Protection Proceedings	2.30	500.00			1,150.00
		Researching the Third Circuit's standard for the first prong (likelihood of success) for granting a preliminary injunction in bankruptcy.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.30	485.00			1,115.50
		Review of October 22, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial.					
06-26-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	775.00			697.50
		Conference with co-counsel (Sunni Beville, Michael Maisel, Catherine Castaldi., David Castleman) re findings of fact and conclusions of law.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00			291.00
		Review of October 25, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	485.00			776.00
		Review of November 4, 2021 transcript before the Honorable J. Craig Whitley in In re: LTL Management LLC for the motion to dismiss trial.					
06-26-2023	ML	B140 - Relief from Stay / Adequate Protection Proceedings	0.30	500.00			150.00
		Discussion with U. Ibrahim regarding incorporation of N.C. transcript for motion to dismiss.					
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	500.00			150.00
		Discussion with U. Ibrahim regarding Third Circuit's standard for a preliminary injunction.					
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00			200.00
		Further discussion with U. Ibrahim regarding status of our review of N.C. hearing transcript.					
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	485.00			388.00

Exhibit A Statement of Time and Expense				Page 34 of 39	Rate	Amount
Date	Professional	Task	Hours			
		assumption / rejection motions)				
		Discussion with M. Layden regarding the incorporation of North Carolina transcript to motion to dismiss proceeding.				
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50	
		Discussion with M. Layden regarding Third Circuit standard for granting PI.				
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00	
		Researching whether it is legal error for a trial court to fail to address or resolve a dispositive argument raised by a party.				
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	485.00	533.50	
		Analyzing record to determine to what extent the TRO was amended substantively.				
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	500.00	650.00	
		Researching legal issue regarding failure of court to address dispositive jurisdictional argument.				
06-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00	
		Discussion with M. Layden regarding whether parties can create § 1334 jurisdiction				
06-26-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.70	500.00	850.00	
		Researching legal issue regarding limit of Section 1334 jurisdiction in the Third Circuit.				
06-26-2023	BV	B195 - Non-Working Travel	3.40	387.50	1,317.50	
		Travel to Trenton NJ for motion to dismiss trial.				
06-26-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,160.00	232.00	
		Email communication with M&G team re Findings of Fact/Conclusions of Law.				
06-26-2023	RSM	B160 - Fee/Employment Application	0.10	860.00	86.00	
		Conference with colleague re fee application for May services.				
06-26-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	1,160.00	1,044.00	
		Review transcript of Birnbaum deposition in preparation for MTD trial.				
06-26-2023	JSM	B195 - Non-Working Travel	3.50	580.00	2,030.00	
		Travel to Trenton for MTD trial.				
06-26-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,160.00	1,392.00	
		Analyze Lisman deposition in preparation for MTD trial.				
06-26-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	1,160.00	1,856.00	
		Analyze Mullin deposition in preparation for MTD trial.				
06-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	7.70	1,160.00	8,932.00	
		Attend MTD trial in Trenton.				
06-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	1,160.00	928.00	
		Review LTL surreply in further opposition to MTD.				
06-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00	
		Review AHC surreply in further opposition to MTD.				
06-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	1,160.00	2,436.00	
		Drafting findings of fact/conclusions to law in connection with MTD.				
06-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,160.00	1,392.00	
		Meeting with TCC counsel to discuss legal strategy in connection with MTD trial.				
06-27-2023	RSM	B190 - Other Contested Matters (excluding	1.80	860.00	1,548.00	

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-27-2023	RSM	Reviewed portion of testimony of Wuesthoff for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	860.00	430.00
06-27-2023	RSM	Reviewed portion of testimony of Dickinson for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	860.00	946.00
06-27-2023	BV	Reviewed portion of testimony of Kim for purposes of developing factual support for motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings	9.70	775.00	7,517.50
06-27-2023	JSM	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,160.00	580.00
06-27-2023	ML	Meet with TCC counsel re preparation of Findings of Fact/Conclusions of Law. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	500.00	150.00
06-27-2023	ML	Discussion with U. Ibrahim re preparation of PI appeal appendix. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	500.00	50.00
06-27-2023	UI	Discussion with U. Ibrahim regarding incorporating edits in draft PI appeal motion. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	485.00	145.50
06-27-2023	UI	Discussion with M. Layden re preparation of PI appeal appendix. B140 - Relief from Stay / Adequate Protection Proceedings	0.10	485.00	48.50
06-27-2023	UI	Discussion with M. Layden re incorporating edits in draft PI appeal motion. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00	48.50
06-27-2023	UI	Drafting email communication to M. Layden re Bell's deposition transcript. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	485.00	145.50
06-27-2023	ML	Discussion with M. Layden re motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.10	500.00	1,550.00
06-27-2023	BV	Analyzing debtor's sur-reply brief in support of its objection to the motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	775.00	775.00
06-27-2023	UI	Conference with co-counsel (Sunni Beville, Michael Maisel, Catherine Castaldi., David Castleman) re findings of fact and conclusions of law. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	485.00	485.00
06-27-2023	UI	Analyzing the June 7, 2023 expert report of Charles H. Mullin, PhD for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.70	485.00	3,249.50
06-27-2023	ML	Attendance in motion to dismiss trial for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan. B190 - Other Contested Matters (excluding assumption / rejection motions)	7.00	500.00	3,500.00
06-27-2023	ML	Attending hearing on motion to dismiss Debtor's bankruptcy petition. B140 - Relief from Stay / Adequate Protection Proceedings	0.60	500.00	300.00
06-27-2023	UI	Reviewing case docket to determine current status of preliminary injunction order. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	485.00	145.50
06-27-2023	BV	Research regarding whether an order has been entered regarding the extension of the preliminary injunction through August 22 so as to trigger notice of appeal deadline. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.50	775.00	1,937.50

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
06-28-2023	BV	Attending trial on motion to dismiss for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan. B190 - Other Contested Matters (excluding assumption / rejection motions)	5.40	775.00	4,185.00
06-28-2023	ML	Attending trial on motion to dismiss for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan. B140 - Relief from Stay / Adequate Protection Proceedings	0.30	500.00	150.00
06-28-2023	UI	Researching legal issue of whether irreparable harm may be manufactured by movant for purposes of obtaining a preliminary injunction. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.60	485.00	3,201.00
06-28-2023	UI	Attend motion to dismiss hearing. B140 - Relief from Stay / Adequate Protection Proceedings	0.40	485.00	194.00
06-28-2023	UI	Discussion with M. Layden re PI appendix. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	485.00	679.00
06-28-2023	UI	Review May 31, 2023 deposition of Adam Lisman for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00	97.00
06-28-2023	UI	Discussion with M. Layen re drafting Findings of Fact and Conclusions of Law for the motion to dismiss trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	485.00	388.00
06-28-2023	BV	Review June 25, 2023 deposition of Adam Lisman for the motion to dismiss trial. B110 - Case Administration	7.20	775.00	5,580.00
06-28-2023	RSM	Analyzing filings to draft appeal brief before District of New Jersey Court regarding the appointment of Future Claims Representative. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	860.00	1,806.00
06-28-2023	RSM	Reviewed portion of Murdica testimony for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	860.00	516.00
06-28-2023	RSM	Reviewed portion of Watts testimony for purposes of developing factual support for motion to dismiss. B160 - Fee/Employment Application	1.80	860.00	1,548.00
06-28-2023	RSM	Worked on monthly fee application for May services. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-28-2023	RSM	Reviewed portion of Onder testimony for purposes of developing factual support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00	258.00
06-28-2023	RSM	Reviewed portion of Lisman testimony for purposes of developing factual support for motion to dismiss. B160 - Fee/Employment Application	0.20	860.00	172.00
06-28-2023	ML	Confer with colleague re work on monthly fee application for May services. B190 - Other Contested Matters (excluding assumption / rejection motions)	7.90	500.00	3,950.00
06-28-2023	BV	Attending hearing on motion to dismiss bankruptcy proceeding. B140 - Relief from Stay / Adequate Protection Proceedings	2.40	775.00	1,860.00
06-28-2023	JSM	Drafting appeal brief before District of New Jersey Court regarding preliminary injunction order. B190 - Other Contested Matters (excluding assumption / rejection motions)	8.60	1,160.00	9,976.00
06-28-2023	JSM	Attend MTD trial in Trenton. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.80	1,160.00	2,088.00
		Meeting with TCC counsel to discuss legal strategy in connection with MTD trial.			

Date	Professional	Task	Hours	Rate	Amount
06-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	5.30	1,160.00	6,148.00
06-28-2023	JSM	Revising appellant's brief in PI appeal, DNJ 23-cv-02567. B160 - Fee/Employment Application	0.80	1,160.00	928.00
06-29-2023	JSM	Reviewing LTL 2.0 fee application for Massey & Gail time and expenses for April - May. B140 - Relief from Stay / Adequate Protection Proceedings	5.70	1,160.00	6,612.00
06-29-2023	JSM	Revising appellant's brief in PI appeal, DNJ 23-cv-02567. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	1,160.00	1,856.00
06-29-2023	JSM	Meeting with TCC counsel to discuss legal strategy in connection with MTD trial. B190 - Other Contested Matters (excluding assumption / rejection motions)	7.80	1,160.00	9,048.00
06-29-2023	RA	Attend MTD trial in Trenton. B110 - Case Administration	0.70	320.00	224.00
06-29-2023	RA	Review updated PHV papers for JSM and BRV. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.40	320.00	1,088.00
06-29-2023	RA	Review and revise Appellant's opening brief in D.N.J., case no. 3:23-cv-02567. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.90	320.00	928.00
06-29-2023	RA	Cite check Appellant's opening brief in D.N.J., case no. 3:23-cv-02567. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.40	320.00	768.00
06-29-2023	ML	Prepare legal authorities in support of MTD second bankruptcy petition briefing. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.40	500.00	700.00
06-29-2023	RSM	Preparing memorandum regarding Bell reports. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	860.00	430.00
06-29-2023	RSM	Reviewed portion of Bernbaum testimony for purposes of developing support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00	344.00
06-29-2023	RSM	Reviewed portion of Mullin testimony for purposes of developing support for motion to dismiss. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	860.00	1,032.00
06-29-2023	RSM	Reviewed portion of Burian testimony for purposes of developing support for motion to dismiss. B110 - Case Administration	0.20	860.00	172.00
06-29-2023	UI	Correspondence with B. Vallacher re FCR issues. B190 - Other Contested Matters (excluding assumption / rejection motions)	5.90	485.00	2,861.50
06-29-2023	UI	Attend motion to dismiss hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	6.10	485.00	2,958.50
06-29-2023	BV	Analyzing Adam Lisman motion to dismiss trial testimony for consolidation in statements of fact and conclusions of law. B140 - Relief from Stay / Adequate Protection Proceedings	0.80	775.00	620.00
06-29-2023	ML	Reviewing J. Massey's edits to appeal brief before District of New Jersey Court regarding preliminary injunction order to confirm his revisions did not cut important arguments. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	500.00	250.00
06-29-2023	UI	Discussion with U. Ibrahim regarding motion to dismiss trial expert testimony. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	485.00	291.00
		Meeting with M. Layden re motion to dismiss trial expert testimony.			

Date	Professional	Task	Hours	Rate	Amount
06-29-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	500.00	200.00
		Reviewing Dr. Bell's supplemental expert report.			
06-29-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	500.00	250.00
		Reviewing deposition testimony of Dr. Bell.			
06-29-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	6.70	500.00	3,350.00
		Attending hearing on motion to dismiss bankruptcy proceeding.			
06-29-2023	BV	B110 - Case Administration	11.30	775.00	8,757.50
		Drafting factual background section of appeal brief before District of New Jersey Court regarding the appointment of Future Claims Representative.			
06-29-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.10	775.00	2,402.50
		Attending trial on motion to dismiss for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan.			
06-30-2023	BV	B110 - Case Administration	6.40	775.00	4,960.00
		Drafting appeal brief before District of New Jersey Court regarding the appointment of Future Claims Representative.			
06-30-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.80	500.00	2,400.00
		Attending hearing on motion to dismiss bankruptcy proceeding.			
06-30-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.50	485.00	2,182.50
		Attend motion to dismiss hearing.			
06-30-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.90	775.00	3,797.50
		Attending trial on motion to dismiss for LTL Management LLC, Case No. 23-12825 before the Honorable Michael B. Kaplan.			
06-30-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	0.20	485.00	97.00
		Discussion with R. Aguirre re preparing appendix for the PI appeal to the District Court.			
06-30-2023	RSM	B160 - Fee/Employment Application	0.10	860.00	86.00
		Correspondence with US Trustee re LTL fee discharge.			
06-30-2023	RSM	B160 - Fee/Employment Application	0.30	860.00	258.00
		Revised final draft of monthly fee application for April and May services.			
06-30-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	860.00	516.00
		Analyzed Debtor's factual arguments on the record evidence in opposition to motion to dismiss.			
06-30-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	500.00	600.00
		Researching what appearance of impropriety means in the Third Circuit for PI appeal.			
06-30-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	4.60	485.00	2,231.00
		Revising preliminary injunction appellate brief to the United States District Court for the District of New Jersey.			
06-30-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.80	500.00	900.00
		Cite checking draft brief in support of the appeal of bankruptcy court's PI order.			
06-30-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	0.40	485.00	194.00
		Discussion with M. Layden re the definition of "appearance of impropriety" in the Third Circuit for the PI appeal.			
06-30-2023	RA	B160 - Fee/Employment Application	1.20	320.00	384.00
		Finalize April 14, 2023 - May 31, 2023 fee application.			
06-30-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	320.00	352.00
		Continue to cite check Appellant's opening brief in D.N.J., case no. 3:23-cv-02567.			

Date	Professional	Task	Hours	Rate	Amount
06-30-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	6.80	1,160.00	7,888.00
06-30-2023	JSM	Attend MTD trial in Trenton.	1.50	1,160.00	1,740.00
06-30-2023	JSM	Meeting with TCC counsel to discuss legal strategy in connection with MTD trial.	3.80	580.00	2,204.00
06-30-2023	BV	B195 - Non-Working Travel	3.40	387.50	1,317.50
		Travel home to DC after MTD trial from Trenton.			
		Travel back to DC area from Trenton NJ following motion to dismiss trial.			
Total					677,430.00

Time Summary

Professional	Hours	Amount
Bret Vallacher	213.20	162,595.00
Jonathan Massey	243.30	274,514.00
Matthew Layden	162.20	81,100.00
Rachel Morse	44.70	38,442.00
Rob Aguirre	56.80	18,176.00
Schuyler Davis	11.40	5,700.00
Usama Ibrahim	199.80	96,903.00
Total		677,430.00

Expenses

Expense	Description	Amount
E110 - Out of town travel	JSM - Round trip mileage reimbursement for 6/13 bankruptcy hearing in Trenton, NJ.	242.35
E110 - Out of town travel	JSM - Meal while in Trenton, NJ for 6/13 bankruptcy hearing.	30.39
E110 - Out of town travel	JSM - Lodging (2 nights) while in Trenton, NJ for 6/13 bankruptcy hearing.	420.68
E110 - Out of town travel	BV - Mileage reimbursement for trip to NJ for 6/27 - 6/30 MTD trial in Trenton.	131.00
E110 - Out of town travel	JSM - Round trip mileage reimbursement for 6/27 - 6/30 trial in Trenton, NJ.	242.36
E110 - Out of town travel	BV - Lodging (4 nights) in Trenton, NJ for 6/27 - 6/30 MTD trial.	914.53
E110 - Out of town travel	BV - Mileage reimbursement for return from NJ for 6/27 - 6/30 MTD trial in Trenton.	131.65
E110 - Out of town travel	JSM - Lodging (3 nights) in Trenton, NJ for 6/27 - 6/30 MTD trial.	686.43
Total Expenses		2,799.39
Total for this Invoice		680,229.39